

REMARKS

This Application has been carefully reviewed in light of the Office Action electronically sent March 19, 2008. Claims 8-14 were pending in the Application. Claims 8-13 are rejected and Claim 14 is allowed in the Office Action. Applicants have added new Claims 54-99.

Withdrawal of Allowability

Applicants note the Examiner's withdrawal of the allowability of Claims 8-13, but are confused by the Examiner's reference to a "Kumar" reference. The patent number cited in the "Allowable Subject Matter" section and in the claim rejections section is U.S. Patent No. 6,671,262 (to Kung), which is not a newly discovered reference (it was used in previous Office Actions to reject many of the claims).

Applicants noted in their previous response that they were only canceling Claims 1-7 and 15-53 to expedite issuance of a patent given the Examiner's indication that Claims 8-14 were allowed. However, since the Examiner now has withdrawn this allowance (in light of a previously cited and argued reference), Applicants have added back previous Claims 1-7 and 15-53 in the present Response as new claims 54-99. Applicants respectfully submit that these claims are in condition for allowance for the same reasons provided in Applicants' previous Responses.

Section 103 Rejections

The Office Action rejects Claims 8-13 under 35 U.S.C. § 103 as being unpatentable over U.S. Patent No. 6,671,262 issued to Kung et al. ("*Kung*"). Applicants assume that the references in the rejection to "Kumar" are typographical errors and meant to refer to *Kung* (it appears all the citations are to *Kung*).

Independent Claim 8 of the present application recites the following limitations:

A method for device registration replication, comprising:
providing a plurality of call managers in a packet-based network, each
call manager controlling one or more devices coupled to the packet-based

network and storing composite registration information associated with the devices controlled by the plurality of call managers;
determining that a first call manager has gone off-line; and
deleting registration information associated with the first call manager from the composite registration information stored by a second call manager.

Claim 8 is allowable because *Kung* does not disclose, teach or suggest each and every one of these limitations. For example, *Kung* does not disclose a plurality of call managers that each store “composite registration information associated with the devices controlled by the plurality of call managers.” *Kung* does not disclose that a call manager stores *composite* registration information about devices controlled by a plurality of call managers (i.e., which necessarily includes registration information about devices controlled by other call managers). The Office Action asserts that this limitation is disclosed at Column 10, lines 55-65 of *Kung*, which the Office Action characterizes as disclosing that the “call manager includes a storage listing number of subscribers, verifies identity of the calling subscribers and authenticates whether a call is authorized.” This is not a disclosure of a call manager that stores *composite* registration information about devices controlled by a plurality of other call managers.

Furthermore, *Kung* does not disclose “determining that a first call manager has gone off-line; and deleting registration information associated with the first call manager from the composite registration information stored by a second call manager.” First, Applicants note that the Office Action addresses particular limitations at the top of page 4 of the Office Action from canceled Claim 1, not Claim 8. To the extent these arguments are being applied to Claim 8, Applicants reiterate the arguments made before by Applicants in conjunction with the previous rejection of Claim 1. For example, the present Office Action asserts that these limitations of Claim 1 are disclosed by a teaching in *Kung* that a call manager determines that it needs resources for a call and communicates with other call managers requesting available resources for the call. Although step 1315 of Figure 13 of *Kung* discloses communications between call managers, there is no disclosure that any such communications are in response to a change in which call manager of the plurality of call managers controls a device (such as a call manager going off-line). Furthermore, there is no disclosure that such communications are for the purposes of changing (e.g., causing the deletion of) any registration information.

Moreover, the Examiner goes on to assert that deleting existing subscribers or adding new subscribers is inherent given the fact that *Kung* discloses updating registration information. However, Applicants believe this inherency argument is moot given the fact that *Kung* does not disclose updating (or even storing) composite registration information, as discussed above. Furthermore, the paragraph asserting inherency also mentions *Kung* alleged teaching of “updat[ing] the new calling subscribers to the conference call.” Applicants are unsure to what the Examiner is referring and how it relates to storing composite registration information as claimed. *Kung* merely discloses finding a resource for a call (CS) and then initiating the call using that resource. This is not a teaching of updating composite registration information as claimed.

For at least this reasons, Applicants respectfully submit that Claim 8 is in condition for allowance. Therefore, Applicants request reconsideration and allowance of Claim 8, as well as Claim 9, which depends from Claim 8.

In addition to its dependence from allowable Claim 8, Claim 9 is also allowable since *Kung* does not disclose the additional limitations recited in this dependent claim. For example, Claim 9 recites “wherein determining that a first call manager has gone off-line comprises . . . failing to receive a response from the first call manager, the first call manager having previously responded to a polling message from the second call manager.” For a teaching of this limitation, the Office Action points to steps 1315 and 1317 of Figure 13 of *Kung*. However, the “NO” branch referenced by the Examiner is referring to an indication from other call managers that there are no resources available for a call. This would be the opposite of failing to receive a response from a call manager since the call manager responded to indicate that no resources are available. For at least this additional reason, Claim 9 is allowable.

Furthermore, although the specific limitations of independent Claim 10 are not addressed, Claim 10 is allowable at least for reasons similar to those provided above in conjunction with Claim 8. Therefore, Applicants request reconsideration and allowance of Claim 10, as well as Claims 11-13, which depend from Claim 10.

In addition to its dependence from allowable Claim 10, Claim 12 is also allowable since *Kung* does not disclose the additional limitations recited in this dependent claim. For example, Claim 12 recites “combining the registration information received from the second and third call managers by the first call manager to form the composite registration information stored by the first call manager.” With respect to this claim, the Office Action does not cite to any particular portion of *Kung*. Instead, the Office Action makes broad generalizations and assumptions that are not supported by the reference. Applicants respectfully submit that this is improper and contend that *Kung* does not disclose combining registration information from a number of different call managers since it doesn’t disclose a call manager that stores registration information about devices controlled by other call managers (as discussed above). For at least this additional reason, Claim 12 is allowable.

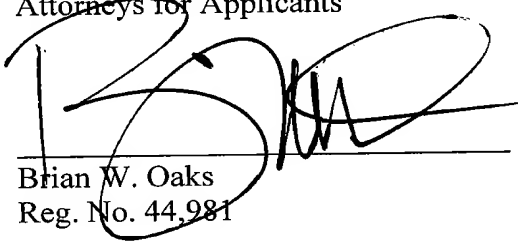
CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully requests full allowance of all pending claims.

If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Brian W. Oaks, Attorney for Applicants, at the Examiner's convenience at (214) 953-6986.

Although no fees are believed to be due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,
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